



Mars Khaimov Law, PLLC

100 Duffy Ave., Suite 510

Hicksville, NY 11801

Tel.: 929.324.0717

Fax: 929.333.7774

E-mail: mars@khaimovlaw.com

Honorable Jessica G.L. Clarke
United States District Court
Southern District of New York
500 Pearl St.
New York, New York 10007

April 24, 2025

MEMO ENDORSED

Re: *Case 1:23-cv-06879-JGLC Toro v. Dean & Tyler, Inc.*
Request to Adjourn Conference and Status Report

To the Honorable Clarke,

Plaintiff submits this letter-motion respectfully to request an adjournment of the case management conference currently scheduled for May 1, 2025. Plaintiff's Counsel will be traveling during the week of the conference, and will be unable to attend the conference in-person. As such, Plaintiff respectfully requests that the conference be adjourned to May 6, 2025, or a date thereafter more suitable to the Court. This is the first time this relief is being requested, and Defendant has provided its consent.

Additionally, this letter also serves as the Parties' joint status update, as required by Rule 3(d) of Your Honor's individual rules. Discovery has concluded herein. The Parties have spent well over an hour in attempts to resolve this suit, and those communications are ongoing. At this time, the Parties do not consent to a mediation or settlement conference herein, as they do not believe it would be the best use of the Court's resources and time.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Mars Khaimov

Mars Khaimov, Esq.
Attorney for Plaintiff

/s/ David Stein

David Stein, Esq.
Attorney for Defendant





Mars Khaimov Law, PLLC

Application GRANTED. The case management conference currently scheduled for May 1, 2025 is HEREBY RESCHEDULED to **May 7, 2025 at 3:00 PM**. The Clerk of Court is respectfully directed to terminate ECF No. 33.

SO ORDERED.

A handwritten signature in blue ink that reads "Jessica Clarke".

JESSICA G. L. CLARKE
United States District Judge

Dated: April 28, 2025
New York, New York

